

Email

July 2, 2008

Mr. Thomas J. Flynn, III
South Carolina DHEC
Bureau of Air Quality
2600 Bull Street
Columbia, SC 29201

Re: Network Description and Ambient Air Network Monitoring Plan
Calendar Year 2009 Review

Dear Mr. Flynn:

The following comments are provided on behalf of the South Carolina Chamber of Commerce Environmental Technical Committee (ETC) regarding the draft *Network Description and Ambient Air Network Monitoring Plan / Calendar Year 2009* ("Plan").

The South Carolina Chamber of Commerce (Chamber), with over 5000 member companies, represents a very diverse group of businesses with interests in South Carolina. The comments provided in this submittal do not preclude member companies from submitting additional comments directly or through other associations with which they are affiliated.

Because of the tightening of ambient air quality standards and the likelihood that this trend will continue, Chamber member companies are acutely aware of the importance of the monitoring network. Attainment status designation can have a dramatic economic impact on a given geographic region. The ability of existing facilities to expand or new facilities to locate in an area is many times directly related to these designations. The monitoring network also provides background ambient air concentrations for New Source Review evaluations. The ambient air monitoring network is therefore critically important for these reasons, in addition to serving as the foundation for many public health and non-regulatory environmental decisions.

The ETC appreciates the opportunities provided by SCDHEC to discuss the Plan and the summary information provided on the proposed changes. The ETC feels that SCDHEC did a very thorough job in evaluating and documenting the basic requirements for the network, and including many appropriate changes.

The ETC acknowledges the recent efforts of SCDHEC in establishing a new Greenville metropolitan monitoring site, as outlined in the current Plan. There was a general consensus that addressing ambient air quality monitoring concerns in this area was a priority. SCDHEC is to be commended for addressing this issue in a prompt manner.

The ETC requests that SCDHEC continue dialogue with the Georgetown area stakeholder group to address their concerns with monitor locations. There appears to be significant unresolved issues that are not yet adequately addressed in the Plan, as proposed.

The ETC is concerned with the progress made in implementing the other changes previously identified in the current Plan. It is suggested that an overall schedule be developed for implementing these changes. This will facilitate interested stakeholder engagement and input. ETC member companies remain committed to assist in evaluating the appropriateness of individual monitor locations, and securing better sites as deemed necessary.

The ETC remains concerned about the SCDHEC policy allowing extended use of special purpose monitors (SPMs). We feel strongly that SPMs should only be used for very specific purposes and operated for no more than two years. This will ensure that the monitoring data can not be misused or misinterpreted.

Thank you again for the opportunities to provide for input. If you have any questions, please do not hesitate to call me at 803-425-4625.

Sincerely,

James P. Witkowski
ETC Air Subcommittee Chair

cc: Jack Preston / SCE&G - ETC Chair
Ben Twilley - SC Chamber of Commerce